

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|--------------------------|---|------------------------------------|
| |) | |
| In re: |) | Bankruptcy No. 10-26798 MBM |
| David A. Leff and |) | |
| Deborah J. Leff |) | |
| Debtors |) | Chapter 7 |
| |) | |
| David A. Leff and |) | |
| Deborah J. Leff |) | |
| Movants |) | |
| |) | |
| Vs. |) | |
| Citifinancial |) | |
| Respondent |) | |

Motion to Redeem Pursuant to 11 U.S.C. § 722

AND NOW, come the Debtors, David A. Leff and Deborah J. Leff, and set forth the following in support of their Motion to Redeem:

1. This Honorable Court has Jurisdiction of this core proceeding for redemption, pursuant to 28 U.S.C. §157. Venue is appropriate pursuant to 28 U.S.C. §1409.
2. The Movants are Debtors in this proceeding.
3. The Respondent, Citifinancial, has its usual office or place of business at 300 Saint Paul Place, Baltimore, MD 21202.
4. On or about October, 2009, the Debtors granted a non-purchase money security interest to the Respondent in the Debtors' 1997 Dodge Caravan Passenger LE Minivan, VIN 2B4FP2530VR445675.

5. The amount which the Debtors owe to Citifinancial for the loan which is secured by their 1997 Dodge Caravan is approximately \$14,900.00, and the account number is 607380554935XXX.

6. The debt is a dischargeable consumer debt.

7. The Debtors have claimed an exemption in the aforesaid Dodge Caravan in the amount of \$3,450. A true and correct copy of the Debtors' schedule C is attached hereto and marked Exhibit "A".

8. The fair market value of the 1997 Dodge Caravan Passenger LE Minivan is believed to be \$350 for the reason that the vehicle is in very poor condition, because it has transmission and brake problems; the air conditioning is inoperable, the cassette player does not work, it lacks cruise control, it lacks power door locks, it lacks a tilt wheel, it lacks power windows, it lacks alloy wheels and it has over 111,000 miles on the odometer.

9. Section 722 of title 11, U.S.C. authorizes the Debtors to redeem the said vehicle from the lien against the vehicle by paying Citifinancial the amount of \$350, which is the secured claim of Citifinancial, that is secured by the lien.

WHEREFORE, Debtors respectfully request this Honorable Court to enter the attached Order.

Respectfully Submitted

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